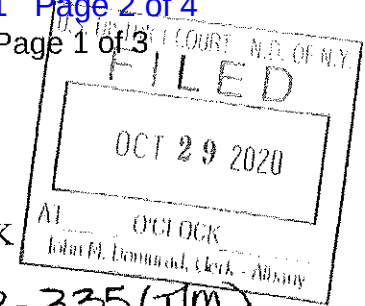


Exhibit “A”



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JACOB DELANEY,

Defendant.

) Criminal No. **1:20-cr-335(TJM)**
)
) **Indictment**
)
) Violations: 18 U.S.C. § 2252A(a)(2)(A) &
) (b)(1) [Receipt of Child
) Pornography];
)
) 18 U.S.C. § 2252A(a)(5)(B) &
) (b)(2) [Possession of Child
) Pornography]
)
) 4 Counts and Forfeiture Allegation
)
) County of Offense: Ulster

THE GRAND JURY CHARGES:

COUNT 1

[Receipt of Child Pornography]

From in or about September 2018 through on or about December 11, 2019 in Ulster County in the Northern District of New York and elsewhere, the defendant, **JACOB DELANEY**, did knowingly receive child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant did receive graphic image and video files depicting one or more minors engaged in sexually explicit conduct by use of the Internet, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNTS 2-4

[Possession of Child Pornography]

On or about December 12, 2019, in Ulster County in the Northern District of New York, the defendant, **JACOB DELANEY**, did knowingly possess material that contained one or more

images and videos of child pornography that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been transported in and affecting such commerce by any means, including by computer, that is the electronic media described below, which contained numerous graphic images and videos of minors engaged in sexually explicit conduct, in violation of Title 18, United States Code, Sections 2252A(a)(5)(B).

Count	Material
2	Dell Laptop computer bearing serial number FN47R32, manufactured in China, and containing Samsung SSD bearing serial number S1D2NYAG403787
3	KESU 120GB hard drive, made in China
4	SanDisk Cruzer flash drive bearing number BL1102OHYB, made in China

These violations involved images and videos of child pornography involving prepubescent minors and minors who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252A(b)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Four of this indictment are hereby realleged and incorporated by reference herein for the purposes of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of any of the charges alleged in Counts One through Four of this indictment, the defendant, **JACOB DELANEY**, shall forfeit to the United States of America:

- (a) Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, and 2260, and any book, magazine, periodical, film, videotape, and other matter which contains any such visual depiction, which was produced,

transported, mailed, shipped and received in violation of Chapter 110 of Title 18 of the United States Code;

(b) Any property, real and personal, constituting and traceable to gross profits and other proceeds obtained from such offense; and

(c) Any property, real and personal, used and intended to be used to commit and to promote the commission of such offense and any property traceable to such property.

The property to be forfeited includes, but is not limited to, the following:

- (1) A Dell Laptop computer bearing serial number FN47R32;
- (2) A Samsung SSD bearing serial number S1D2NYAG403787;
- (3) A KESU 120GB hard drive; and
- (4) A SanDisk Cruzer flash drive bearing number BL1102OHYB.

Dated: October 29, 2020


A TRUE BILL, Name Redacted



Grand Jury Foreperson

ANTOINETTE T. BACON
Acting United States Attorney

By:


Alicia G. Suarez
Assistant United States Attorney
Bar Roll No. 700218